

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)	Chapter 11
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	Case No. 10-93904-BHL-11
)	
Debtors.)	
)	
<hr/>)	
FRIONA INDUSTRIES, L.P.,)	
)	
Plaintiff,)	
)	
v.)	Adversary Proceeding No. 11-59093
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	
)	
Defendants.)	
)	
and)	
)	
CACTUS GROWERS, INC.,)	
)	
Intervenor,)	
)	
v.)	
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	
)	
and)	
)	
J & F OKLAHOMA HOLDINGS, INC.,)	
)	
Intervenor,)	
)	
v.)	
)	
EASTERN LIVESTOCK CO., LLC, et al.,)	
)	
Defendants.)	

TRUSTEE'S RULE 30(b)(6) NOTICE OF DEPOSITION TO
MOSELEY CATTLE AUCTION, LLC

Please take notice that, pursuant to Fed. R. Civ. P. 30(b)(6) and Fed. R. Bankr. P. 7030, James A. Knauer (the "Trustee"), as the trustee of Eastern Livestock Co., LLC ("ELC"), by counsel, will take the deposition of Moseley Cattle Auction, LLC beginning at 1:00 p.m. EDT on September 6, 2013 at the offices of DelCotto Law Group, PLLC, 200 North Upper Street, Lexington, Kentucky 40507 before a court reporter authorized to administer oaths. The deposition will be conducted in accordance with the July 3, 2012 *Order Establishing Deposition Protocols* [Main Case, Docket No. 1229]. You are invited to appear and take part in such examination.

Definitions

Definitions applicable to this Notice of Deposition include the following:

1. You, "your," and "Moseley" means and refers to Moseley Cattle Auction, LLC, and includes all persons and organizations under your control, including but not limited to your parents, subsidiaries, affiliates, officers, directors, employees, attorneys, accountants, agents, and representatives of any kind.
2. "ELC" or "Eastern" means and refers to Eastern Livestock Co., LLC, and includes its affiliates, members, officers, employees, attorneys, agents, accountants, and representatives of any kind.
3. "Trustee" means and refers to James A. Knauer, as the duly appointed Chapter 11 trustee for Eastern Livestock Co., LLC, and includes his attorneys, agents, and representatives of any kind.
4. "Cattle" means and refers to the cattle identified as "Friona Cattle" in Moseley Cattle Auction, LLC's First Amended Answer to Friona Industries, L.P.'s First Amended

Complaint in Intervention in the Nature of Interpleader, Counterclaims, and Cross-Claims filed as Docket No. 156 in the above-captioned adversary proceeding.

Subjects of Examination

Examination is requested on any and all knowledge possessed by or reasonably available to Moseley relating to the following matters:

1. Any agreement, oral or written, relating to or concerning any of the Cattle.
2. The purchase and sale of any of the Cattle to any person or entity.
3. Any payment that Moseley made or received for any of the Cattle.
4. Moseley's business dealings with ELC during 2009 and 2010.
5. Moseley's business dealings with Friona Industries, L.P. or any related entity during 2009 and 2010.
6. Any conversations that any representative of Moseley had with anyone concerning payment for any of the Cattle.
7. Any conversations that any representative of Moseley had with anyone concerning any of the Cattle.
8. All purchase orders, invoices, shipping records, trucking records or other records that relate to any of the Cattle.

FAEGRE BAKER DANIELS LLP

By: /s/ Dustin R. DeNeal

Counsel for James A. Knauer, Chapter 11 Trustee

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2013, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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